

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE POSEIDON CONCEPTS
SECURITIES LITIGATION

Case No: 13-CV-1213 (DLC)
ECF CASE
CLASS ACTION

DECLARATION OF JONATHAN HORNE

Jonathan Horne declares:

1. I am attorney at The Rosen Law Firm, P.A., counsel to Lead Plaintiff in this action. I make this declaration from personal knowledge, am over the age of 18, and am competent to testify.

2. Attached as Exhibit 1 to this Declaration is a [Proposed] Second Amended Complaint for Violation of the Federal Securities Laws.

3. Attached as Exhibit 2 to this Declaration is the CCAA Initial Order entered in the bankruptcy of Poseidon Concepts Corp. et al., Court of Queen's Bench of Alberta, Calgary Division, Canada, court file number 1301-04364.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 15, 2015

/s/ Jonathan Horne

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2015, the foregoing document was filed with the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Jonathan Horne